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FILED IN OPEN COURT

DATE 11/22/19

BY K. Doan

DEPUTY CLERK

UNITED STATES DISTRICT COURT ~~HARRISONBURG DIVISION, W.D. of VA~~  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

UNITED STATES OF AMERICA

) **INFORMATION**

)  
) Case No. 5:19CR00037

v.

) In Violation of:

)  
AMY JOY HANSEN ) 18 U.S.C. § 1343

The United States Attorney charges that:

1. At all times material to this Information, Firstline Safety Management, Inc.

(“Firstline”) was located at 210 S. Braddock Street, Suite 100, Winchester, Virginia, which is located in the Western Judicial District of Virginia. Firstline provides safety services to construction companies, including job site inspections, accident fatality investigations, safety training and similar other tasks. It has been in business since 1986.

2. Amy Joy HANSEN (“HANSEN”) worked for Firstline beginning on August 1, 2001. Her last day of work was November 6, 2018. HANSEN began in an administrative position and then served as office manager for more than ten years. HANSEN’s duties include managing the office and office personnel, ordering training supplies, various aspects of OSHA training courses, requesting information from and sending information to clients, and responding to client calls and forwarding those calls to the necessary personnel. With regard to business finances, her duties included downloading credit card statements, coding purchases for

bookkeeping purposes, and sending invoices to another individual who handled payroll and accounting.

3. At all times material to this Information, Firstline utilized five access devices: a credit card for purchases at the Staples office supply store, account number ending in 0534 (“Staples Card”); two credit cards issued by Elan Financial Services, account numbers ending in 0198 and 8654 (collectively as “Elan Cards”), a division of U.S. Bancorp; and two Visa cards issued by the Bank of Clarke County, account number ending in 6302 and 6310 (collectively as “Visa Cards”).

#### **The Scheme and Artifice to Defraud**

4. From January 2016 through November 2018, HANSEN devised, and intended to devise, a scheme and artifice to defraud Firstline Safety Management, Inc., and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

#### **Purpose of the Scheme and Artifice to Defraud**

5. A purpose of the scheme and artifice was to obtain money and property through the use of certain access devices belonging to First Line in order to enrich HANSEN.

#### **Manner and Means**

6. In furtherance of the scheme, HANSEN would use the access devices noted in paragraph 3 of this Information to make unauthorized personal purchases on these accounts. HANSEN had access to these access devices as a result of her employment with Firstline. When the credit card statements were received by Firstline, and in attempt to avoid detection, HANSEN would alter the statements to make it appear that the unauthorized charges were legitimate charges from vendors commonly used by Firstline. HANSEN would then forward the altered statement to others in the company for payment.

7. On or between the dates sent forth below, in Winchester, Virginia, and elsewhere, Amy Joy HANSEN, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below:

ACCESS DEVICE	ACCOUNT NUMBER	DATE RANGE	UNAUTHORIZED CHARGES
Elan Card Services	Accounts ending in 0198 and 8654)	January 2016 through December 2017	\$216,672.95
Bank of Clarke County	Accounts ending in 6302 and 6310	December 2017 through November 2018	\$5,925.61
Staples	Account ending in 0534	October 2018 through November 2018	\$6,501.25
<b>TOTAL</b>			<b>\$229,099.81</b>

8. All in violation of Section 1343 of Title 18, of the United States Code.

Date: November 21, 2019

Thomas T. Cullen by /  
THOMAS T. CULLEN  
UNITED STATES ATTORNEY